

**VIA ECF**

August 4, 2023

The Honorable Paul G. Gardephe  
United States District Judge for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*,  
No. 1:21-cv-09441-PGG-OTW (S.D.N.Y.)

Dear Judge Gardephe:

Plaintiff JPMorgan Chase Bank, National Association, London Branch and Defendant Tesla, Inc. (together, the “Parties”), by and through their respective undersigned counsel, write pursuant to the Court’s April 26, 2023 Order for the Parties to provide the Court with a status update. ECF No. 80.

The Parties are presently engaged in fact discovery. On July 19, 2023, Magistrate Judge Wang so-ordered the Parties’ Stipulation and Proposed Order Regarding Case Deadlines that extended the case schedule through the completion of discovery, including extending the deadline for fact discovery, including fact depositions, from August 4, 2023 to December 15, 2023 and extending the deadline for expert discovery from November 10, 2023 to April 19, 2024. ECF No. 97.

The Parties are conferring regarding potential proposed dates for the scheduling of a deadline for a joint pretrial order and a final pretrial conference.

Respectfully submitted,

/s/ Frances E. Bivens

Frances E. Bivens  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, New York 10017  
Tel: (212) 450-4000  
frances.bivens@davispolk.com

*Attorneys for Plaintiff JPMorgan Chase  
Bank, N.A., London Branch*

By: /s/ Jonathan E. Pickhardt

Jonathan E. Pickhardt  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Fl.  
New York, New York 10010  
Tel: (212) 849-7000  
jonpickhardt@quinnemanuel.com

*Attorneys for Defendant Tesla, Inc.*